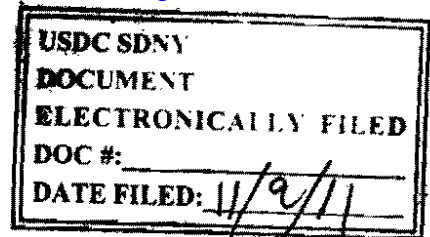


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



IN RE: WORLD TRADE CENTER
DISASTER SITE LITIGATION

21 MC 100 (AKH)

PATRICIA DEFEO,

Plaintiff,

**STIPULATION OF
VOLUNTARY DISMISSAL**

-Against-

CITY OF NEW YORK, *et al.*,


Defendant(s).

Civil Action No.: 06cv08957

IT IS HEREBY STIPULATED AND AGREED, by and between the parties that, pursuant to the Federal Rule of Civil Procedure 41(a)(1)(A)(ii):

1. The above-captioned Plaintiff's action is voluntarily dismissed with prejudice pursuant to the following terms and conditions:
2. All claims by the above-captioned Plaintiff against all Defendant(s) or against any Defendant arising out of or relating in any way to World Trade Center-related rescue, recovery, and/or debris-removal operations and/or clean up at any location on and/or after September 11, 2001, are voluntarily dismissed with prejudice.
3. All claims that were asserted or could have been brought in relation to Plaintiff's existing pleadings are dismissed with prejudice.
4. This dismissal is without prejudice solely in relation to a second injury to the extent permitted by New York State law and as may be defined by any court having jurisdiction over any such later-filed complaint. If after this Stipulation is filed Plaintiff commences an action asserting such alleged second injury claims against any or all of the entities listed on Exhibit A to the World Trade Center Litigation Settlement Process Agreement, As Amended ("Amended SPA"), such action shall constitute a "New Debris Removal Claim" as defined in the Amended SPA.
5. The dismissal is without costs.

PATTON BOGGS LLP

By: 
 James R. Tyrrell, Jr. (JT-676)
 One Riverfront Plaza, 6th Floor
 Newark, New Jersey 07102
 (973) 848-5800
 Attorney for WTC Captive Insureds

Dated: October 24, 2011

LITCHFIELD CAVO LLP

By: _____
 James Regan (8289)
 420 Lexington Avenue, Suite 2104
 New York, NY 10170
 (212) 434-0100
 Attorney for Seasons Industrial Contracting


Dated: October _____, 2011

SCHIFF HARDIN LLP

By: _____
 Paul Scudato (PS-5927)
 666 Fifth Avenue, 17th Floor
 New York, NY 10103
 (212) 753-5000
 Attorney for Port Authority of New York &
 New Jersey


Dated: October _____, 2011

**WORBY GRONER EDELMAN & NAPOLI
BERN**

By: 
 Christopher R. LoPalo (CL 6466)
 350 Fifth Avenue, Suite 7419
 New York, New York 10118
 (212) 267-3700
 Attorney for Plaintiff

Dated: October 21, 2011

MORRISON MAHONEY LLP

By: 
 Gary W. Harvey
 250 Summer Street
 Boston, MA 02210-1181
 (212) 428-2498
 Attorney for Survivor

Dated: October 34, 2011

SO ORDERED: 11/9/11


ALVIN K. HELLERSTEIN, U.S.D.J.

Dated: October 24, 2011

Christopher R. LoPalo (CL 6466)
350 Fifth Avenue, Suite 7413
New York, New York 10118
(212) 267-3700
Attorney for Plaintiff

Dated: October 21, 2011

James Regan (8259)
420 Lexington Avenue, Suite 2104
New York, NY 10170
(212) 434-0100
Attorney for Seasons Industrial Contracting
UNDERWRITER

Dated: October 2, 2013


Gary W. Harvey
250 Summer Street
Boston, MA 02210-1181
(212) 428-2498
Attorney for Survivors

Dated: October ____, 2011.

Paul Scrudato (PS-5927)
666 Fifth Avenue, 17th Floor
New York, NY 10103
(212) 753-5000
*Attorney for Port Authority of New York &
New Jersey*

Dated: October ____, 2011

PATTON BOGGS LLP

By: 
James E. Tyrrell, Jr. (JT-676)
One Riverfront Plaza, 6th Floor
Newark, New Jersey 07102
(973) 848-5600
Attorney for WTC Captive Insureds



Dated: October 24, 2011

LITCHFIELD CAVO LLP

By: _____
James Regan (B289)
420 Lexington Avenue, Suite 2104
New York, NY 10170
(212) 434-0100
Attorney for Seasons Industrial Contracting


Dated: October ____, 2011

SCHIFF HARDIN LLP

By:  
Paul Seruchan (PS-3927) Rob Richter
666 Fifth Avenue, 17th Floor
New York, NY 10103
(212) 753-5000
Attorney for Port Authority of New York & New Jersey

Dated: October 25, 2011

**WORBY GRONER EDELMAN & NAPOLI
BERN**

By: 
Christopher R. LoPalo (CL 6466)
350 Fifth Avenue, Suite 7413
New York, New York 10118
(212) 267-3700
Attorney for Plaintiff

Dated: October 21, 2011

MORRISON MAHONEY LLP

By: _____
Gary W. Harvey
250 Summer Street
Boston, MA 02210-1181
(212) 428-2498
Attorney for Survivor

Dated: October ____, 2011